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Miller v. Alabama:

Supreme Court Holds that Mandatory Life Sentences for Juvenile Offenders Violates the Eighth Amendment Proscription Against Cruel and Unusual Punishment

On June 25, 2012, the U.S. Supreme Court in a five to four decision written by Justice Kagan, held that a sentencing scheme that mandated life in prison without possibility of parole for homicide offenders under the age of 18 was a violation of the Eighth Amendment of the United States Constitution. *Miller v. Alabama*, Case Nos. 10-9646 and 10-9647, 567 U.S. ____ (2012).

The case arose when two 14-year-old offenders were convicted of murder and sentenced to life imprisonment without the possibility of parole. The Eighth Amendment violation occurred as a result of the sentencing authority lacking any discretion to impose a different punishment. The Court asserted, “State law mandated that each juvenile die in prison even if a judge or jury would have thought that his youth and its attendant characteristics, along with the nature of his crime, made a lesser sentence (for example, life with the possibility of parole) more appropriate. Such a scheme prevents those meting out punishment from considering a juvenile’s ‘lessened culpability’ and greater capacity for change’.” citing *Graham v. Florida*, 560 U.S. ____, (2010).

The Court held, relying in part on *Graham* (life without parole violates the Eighth Amendment when imposed on juvenile non-homicide offenders) and *Roper v. Simmons*, 543 U.S. 551 (2005) (death penalty may not constitutionally be imposed on any offender under the age of 18), that children are constitutionally different from adults for purposes of sentencing. “Because juveniles have diminished culpability and greater prospects for reform,” the Court explained, “they are less deserving of the most severe punishments.” The Court pointed to three key differences between those under the age of 18 and adults: 1) a lack of maturity and underdeveloped sense of responsibility; 2) increased vulnerability to outside influences and pressures; and 3) a character that is not “well formed” or fixed compared to an adult’s. Here, the mandatory penalty schemes prevented those empowered to impose the sentence from considering youth as a factor and from assessing whether the law’s harshest term of imprisonment proportionally punished the juvenile offender. The Court therefore held that a mandatory life without parole sentences for those under the age of 18 at the time of their crimes violates the Eighth Amendment’s prohibition on “cruel and unusual punishments.”